(USP 5961593) and Rondeau (USP 5850433) combined.

In response, Applicants respectfully traverse the Examiner's rejections.

§102(e) rejections (Merriman)

Claim 1 is directed towards a method practiced on a ***bridge server***. The method is required to include ***receiving by the bridge server from a client a request for content targeting a network server, and providing by said bridge server, in response to said received request, additional content to the client system, in addition to the requested content to be provided by the network server.***

Note that the plain meaning of the phrase "***a request for content targeting a network server***" requires that the request is directed at the third party ***network server***, not the ***receiving bridge server*** on which the claimed method is being practiced. Furthermore, the plain meaning of the phrase "***providing by said bridge server ... additional content ... in addition to the requested content to be provided by the network server***" requires that the ***additional content*** to be provided by the ***bridge server*** while the ***requested content*** is provided by the targeted ***network server*** of the original request. Moreover, this ***additional content*** is provided in response to the original ***content request*** for the content ***network server***, not in response to a subsequent or an additional request submitted to the ***bridge server***.

Merrimann teaches a method for providing advertisement. A user using browser (16) and conventional http protocol (14) requests content from an affiliate web site (col. 3, lines 23-29). By virtual of the employment of the http protocol, the request is

necessarily addressed to the affiliate web site. In response, the affiliate web site responds with messages containing "all information available at the particular web site 12 for the requested page to be displayed by the user's browser 16, ...(and) a link including an IP address for a node running an advertiser server process 19 as well as information about the page on which the advertisement will be displayed" (col. 3, lines 30-38). [Note that "all information available at web site 12" as well as "the link to the advertisements" are provided by the affiliate web site, the target content server of the request.]

Applicants submit the "advertisement link" are not "additional content". It is merely a "pointer" to a location where the remaining content of the requested page is to be found. Even if we view the "advertisement link" as "additional content", as alluded to earlier, this "additional content" is provided by the same targeted content server, and not by a separate intervening ***bridge server*** that is separate and distinct from the targeted content server of the original content request as required by claim 1.

Upon receipt of the advertisement link, "the user's browser 16 then transmits a message 23 using the received IP address ..." to retrieve the advertisement (col. 3, lines 41-44). This message 23 to advertising server process 19 is nothing more than just a content request. Upon receiving the request, "the advertising server process 19 determines which advertisement or other objects to provide to the user's browser and transmits the messages 24 containing the object such as a banner advertisement to the user's browser ..." (col. 3, lines 52-57). Note that message 24 is provided in response to message 23, not in response to the original request message 20. Thus, message 24 to the user is nothing more than just a content reply to a content request.

When the user clicks on the banner advertisement, "the user's browser again transmits (another) message to the ad server (19)" (col. 3, lines 65-67). Once again, this message is nothing more than a conventional content request. In response, the ad server (19) "transmits back the URL of the advertiser's web page.." (col. 4, lines 3-4). Once again, this reply is nothing more than a conventional content reply that provides a pointer redirecting the requestor to another location to obtain the requested content.

Finally, the user browser (16) generates a message 26 to the advertiser's site (18), to obtain the advertisement, which is returned through message 28. Once again, this is nothing more than a standard content request and reply. Message 28 is provided in response to message 26, not in response to message 23, and certainly not in response to message 20, the original content request message.

Accordingly, applicants submit at best Merriman teaches multiple incremental fulfillment of a content request, through successive requests and replies. The first request for content is partially fulfilled by the targeted server 12, which in addition to providing a portion of the requested page, provides a link to the residual display of the requested page. The first request to ad server 19 is a request to complete the residual content of a previously requested page. The second request to ad server 19 is a new content request. The reply is an answer redirecting the user to the advertiser site to obtain the requested content. The ultimate exchange between the user and the advertiser (18) is nothing more than a standard content request and reply exchange.

Nowhere in this process did Merriman teaches an intermediate ***bridge server*** receiving a request that is targeted to a separate and distinct content provider ***network***

*server*; and as a result of receiving this request targeted for a third party ***network server***, the ***bridge server*** provides additional content to the client, contents that are additional to the requested content to be provided by the targeted content server.

For at least the reasons set forth above, claim 1 is patentable over Merriman.

Claim 2-3 are dependent on claim 1, thus by virtue of at least their dependency, they are also patentable over Merriman.

Claim 19 contains limitations that parallel claim 1 in substance. Thus, for at least the same reason, claim 19 is also patentable over Merriman.

Claims 20-21 are dependent on claim 19, thus by virtue of at least their dependency, they are also patentable over Merriman.

Claim 24 is directed towards a ***bridge server***. It includes the limitations of ***receiving by the bridge server a request for content from a client system targeting a network server, and marking up by the bridge server the received request and returning the marked up request to the client system for re-submission***.

As discussed earlier, in response to content request message 20, site 12 returns part of the display of the requested page, and a link to server 19 for the advertisement to be displayed (which are residual display of the requested page). Even if we ignore the fact that site 12 is the targeted recipient of message 20, Merriman did not teach having site 12 "mark up" message 20, returns the marked up message 20 to user browser 16, and having user browser 16 resubmits the now "marked up" message 20.

Similarly, ad server 19 returns banner ad 24 in response to a first message 23, and a link to site 18 in response to a second message 23. Even if we ignore the fact that site

19 is the targeted recipient of message 23, Merriman did not teach having site 19 "mark up" message 23, returns the marked up message 23 to user browser 16, and having user browser 16 resubmits the now "marked up" message 23.

This deficiency applies equally to the exchange between user browser 16 and site 18. Site 18 returns ad 28 in response to message 26. Even if we ignore the fact that site 18 is the targeted recipient of message 26, Merriman did not teach having site 18 "mark up" message 26, returns the marked up message 26 to user browser 16, and having user browser 16 resubmits the now "marked up" message 26.

Accordingly, claim 24 is clearly patentable over Merrimann.

Claim 29 also contains in substance this concept of an intermediate ***bridge server marking up a content request from a client system, and returning the marked up content request to the client system for re-submission***. Thus, for at least the same patentability reasons of claim 24, claim 29 is patentable over Merrimann.

§102(e) rejections (Angles)

Angles also teaches an advertisement delivery system, for the purpose of this application, is substantially the same as Merriman. Under Angles, just like Merriman, a consumer, using consumer computer 12 requests content from content provider 14. In response, content provider 14 provides most of the display content of the requested page and a link to advertisement provider 18 for the residual display of the requested page. Upon receipt of the link, consumer 12 executes the link and requests the advertisement from advertisement provider 18. In response, advertisement provider 18 provides the advertisement to consumer 12.

Once again the exchange between the consumer and the content provider stands

for the proposition of a content provider partially fulfilling a content request, and redirecting the requestor to an alternate location to obtain the residual content for the request, whereas the exchange between the consumer and the advertisement provider is nothing more than a standard content request and reply.

Therefore, for at least the same reasons set forth above in the discussion of patentability over Merriman, claims 1-3, 19-21, 24 and 29 are also patentable over Angles.

§103 rejections

Neither Gabber nor Rondeau individually or in combination cure the above discussed deficiency of Merriman. Accordingly, by virtue of at least their dependency on claims 1, 19, 24 and 29, claims 4, 6-11, 13-18, 22-23, 25 and 30 are patentable over Merriman, Gabber and Rondeau combined, even if the Examiner's analysis of Gabber and Rondeau are correct (an issue needs not be addressed at the present time).

Conclusion

In view of the foregoing remarks, Applicants respectfully submit that claims 1-4, 6-11, 13-25, and 29-30, are in condition for allowance, and respectfully requests that the Examiner withdraws the finality of the application and grants allowance of such claims.

Please charge any shortages and credit any overages to our Deposit Account No. 02-2666.

Respectfully submitted,
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